

Law Offices of Ezra Spilke

**MEMO ENDORSED**

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January 13, 2020

**BY ECF**

Hon. Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

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Re: *United States v. Montes et al.*, No. 18-CR-840(VEC)  
Client: Dejan Piskacek

Dear Judge Caproni:

This letter is respectfully submitted to request a modification of the conditions of Mr. Piskacek's pretrial release as follows.

On November 26, 2018, Mr. Piskacek was released on an unsecured, \$150,000 bond signed by two co-signers, one of whom is Mr. Piskacek's friend Dafna Gorfinkle. (ECF No. 17). For reasons that have not been made clear to me, Ms. Gorfinkle has asked me to move for her removal from the bond.

I have conferred with Pretrial Services Officer Keyana Pompey and AUSA Christopher Clore, neither of whom object to this request. Mr. Piskacek will be sentenced on February 5, 2020. Accordingly, Mr. Piskacek respectfully requests an order removing Dafna Gorfinkle from the bond. I appreciate the Court's considerate attention to this matter.

Respectfully submitted,

/s/ Ezra Spilke  
Law Offices of Ezra Spilke  
Counsel for Dejan Piskacek

Cc: All counsel of records by ECF  
Ms. Dafna Gorfinkle by email

Application GRANTED.

SO ORDERED.



1/13/2020

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE